

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA) Criminal Case No. 20-cr-7-01/02-LM_____
)
)
 v.)
)
)
 HEIDI COMPOS and)
 JASON MARTIN)

INDICTMENT

The Grand Jury charges:

COUNT ONE
Distribution of Controlled Substance
18 U.S.C. § 2(a); 21 U.S.C. §§ 841(a)(1) & (b)(1)(C)

On or about October 13, 2019, in the District of New Hampshire, the defendants,

HEIDI COMPOS

and

JASON “JAY” MARTIN,

aiding and abetting each other, knowingly and intentionally distributed controlled substances, specifically, fentanyl and cocaine base, commonly known as crack cocaine, both of which are Schedule II controlled substances, in violation of Title 18, United States Code, 2(a) and Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT TWO
Distribution of Controlled Substance
21 U.S.C. §§ 841(a)(1) & (b)(1)(C)

On or about October 22, 2019, in the District of New Hampshire, the defendant,

HEIDI COMPOS,

did knowingly and intentionally distribute controlled substances, specifically, fentanyl and cocaine base, commonly known as crack cocaine, both of which are Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE
Distribution of Controlled Substance
21 U.S.C. §§ 841(a)(1) & (b)(1)(C)

On or about November 18, 2019, in the District of New Hampshire, the defendant,

HEIDI COMPOS,

did knowingly and intentionally distribute a controlled substance, specifically, fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FOUR

Conspiracy to Distribute a Controlled Substance
21 U.S.C. §§ 846, 841(a)(1), (b)(1)(B)(vi), & (b)(1)(C)

From an unknown date, but at least by on and about October 13, 2019, and continuing to on and about November 21, 2019, in the District of New Hampshire and elsewhere, the defendants,

HEIDI COMPOS

and

JASON “JAY” MARTIN,

knowingly and intentionally combined, conspired, confederated and agreed together and with each other, and with other persons known and unknown to the Grand Jury, to commit the following offense against the United States: to possess with intent to distribute and to distribute controlled substances, specifically, 40 grams and more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide, commonly known as fentanyl, and cocaine base, commonly known as crack cocaine, both of which are Schedule II controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(vi), and (b)(1)(C), and 846.

Heidi Compos’s conduct as a member of the conspiracy charged above, which includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved 40 grams and more of a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide a/k/a fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(vi), and 846.

Jason “Jay” Martin’s conduct as a member of the conspiracy charged above, which

includes the reasonably foreseeable conduct of other members of the narcotics conspiracy charged above, involved 40 grams and more of a mixture and substance containing N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide a/k/a fentanyl, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(vi), and 846.

NOTICE OF CRIMINAL FORFEITURE
PURSUANT TO 21 U.S.C. § 853(a)(1) and (2)

Counts One through Four of this Indictment are re-alleged as if fully set forth and incorporated by reference for alleging forfeiture pursuant to 21 U.S.C. § 853(a)(1) and (2). Upon conviction of the offenses alleged above in this Indictment, the defendants, HEIDI COMPOS and JASON MARTIN, shall forfeit to the United States, any property constituting, or derived from, or proceeds obtained, directly or indirectly, as a result of the charged offenses; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the charged offenses.

A TRUE BILL

Dated: January 22, 2020

/s/ Grand Jury Foreperson
FOREPERSON

SCOTT W. MURRAY
UNITED STATES ATTORNEY

/s/ Charles L. Rombeau
By: Charles L. Rombeau
Assistant U.S. Attorney